

1 Richard C. Harlan (*admitted pro hac vice*)  
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3 **LARSON LLP**

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8 Attorneys for Plaintiff and Counter-Defendant

9 T1 PAYMENTS, LLC and Counter-Defendant

10 T1 PAYMENTS LIMITED

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA (LAS VEGAS)

13 T1 PAYMENTS, LLC, a Nevada limited  
14 liability company,

15 Plaintiff,

16 vs.

17 NEW U LIFE CORPORATION, a  
18 California corporation,

19 Defendant.

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21 NEW U LIFE CORPORATION, a  
22 California corporation,

23 Counterclaimant,

24 vs.

25 T1 PAYMENTS LLC, a Nevada limited  
26 liability company, et al.,

27 Counterclaim-Defendants.  
28

Case No. 2:19-cv-01816-ART-DJA

**MOTION TO WITHDRAW AS *PRO*  
*HAC VICE* COUNSEL OF  
RECORD**

1 Pursuant to Local Rule IA 11-6 and Rule 1.16 of the Nevada Rules of  
2 Professional Conduct, undersigned counsel moves the Court for an order  
3 authorizing Richard C. Harlan of Larson LLP to withdraw as counsel for plaintiff  
4 and counterclaim-defendant T1 Payments LLC and counterclaim-defendants T1  
5 Payments Ltd. (collectively, the “T1 Parties”).

6 This Motion is made and based upon the following points and authorities and  
7 the pleadings and papers on file herein.

8  
9 Respectfully,  
10 Dated: January 16, 2024 LARSON LLP

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12  
13 By: /s/ R.C. Harlan  
14 R.C. HARLAN (*admitted pro hac vice*)  
15 Attorneys for Plaintiff and Counter-Defendant  
16 T1 PAYMENTS, LLC and Counter-Defendant  
17 T1 PAYMENTS LIMITED  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

Local Rule IA 11-6(b) provides, “If any attorney seeks to withdraw after appearing in a case, the attorney must file a motion or stipulation and serve it on the affected client and opposing counsel.” Furthermore, LR 11-6(e) provides that “no withdrawal or substitution will be approved if it will result in delay of discovery, the trial, or any hearing in the case.” Similarly, Nevada Rule of Professional Conduct 1.16(b) provides that a lawyer may withdraw from representing a client if “[w]ithdrawal can be accomplished without material adverse effect on the interests of the client.”

Due to the attorney-client privilege and Counsel’s duties of confidentiality and loyalty, Counsel cannot disclose the specific circumstances prompting the instant Motion. However, as set forth in the Declaration of Richard C. Harlan below, multiple bases identified in NRPC 1.16(b) exist for Counsel’s withdrawal. Generally, the relationship between the Firm and the T1 Parties has broken down to the extent that Counsel can no longer effectively represent Defendants’ interests. Harlan Decl. ¶5.

Here, the docket represents that the T1 Parties are represented by multiple attorneys.

The known contact information for the attorneys representing the T1 Parties are as follows:

**T1 Payments LLC**

10161 W. Park Run Drive, Suite 150  
Las Vegas, NV 89145

**Jeffrey A. Cogan**

Jeffrey A. Cogan Esq. Ltd.  
1057 Whitney Ranch Drive, Suite 350  
Henderson, NV 89014  
702-474-4228 (fax)  
jeffrey@jeffreycogan.com

**T1 Payments Ltd.**

290 Moston Lane,  
Manchester, England,  
M40 9WB

**Jeffrey A. Cogan**

Jeffrey A. Cogan Esq. Ltd.  
1057 Whitney Ranch Drive, Suite 350  
Henderson, NV 89014  
702-474-4228 (fax)  
jeffrey@jeffreycogan.com

**Joshua P. Gilmore**  
Bailey Kennedy  
8984 Spanish Ridge Avenue  
Las Vegas, NV 89148  
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(702) 562-8821 (fax)  
jgilmore@baileykennedy.com

**Dennis L. Kennedy**  
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8984 Spanish Ridge Avenue  
Las Vegas, NV 89148  
(702) 562-8820  
(702) 562-8821 (fax)  
dkennedy@baileykennedy.com

**Kelly B. Stout**  
Hone Law  
701 N. Green Valley Pkwy., Suite 200  
Henderson, NV 89074  
702-608-2896  
702-608-2896 (fax)  
kstout@hone.law

**CONCLUSION**

Accordingly, Counsel respectfully requests that this Court grant the Motion to Withdraw as Counsel of Record, and allow Larson LLP to withdraw as counsel for the T1 Parties.

Dated: January 16, 2024

LARSON LLP

By: /s/ R.C. Harlan

R.C. HARLAN (*admitted pro hac vice*)

Attorneys for Plaintiff and Counter-Defendant  
T1 PAYMENTS, LLC and Counter-Defendant  
T1 PAYMENTS LIMITED

**DECLARATION OF RICHARD C. HARLAN**

I, Richard C. Harlan, being first duly sworn, deposes and says:

1. This Declaration is made of my own personal knowledge except where stated on information or belief, and as to those matters, I believe them to be true. If called as a witness, I would competently testify thereto.

2. I hereby affirm under penalty of perjury that the assertions of this Declaration are true.

3. I am a partner with the law firm of Larson LLP and am licensed to practice law in the State of California. I am admitted pro hac vice in the U.S. District Court Nevada and I serve as counsel of record in this action for T1 Payments, LLC and TI Payments Limited.

4. This Declaration is submitted pursuant to NRPC 1.16, and SCR 46 in support of Larson LLP's Motion to Withdraw as Counsel of Record (the "Motion").

5. Due to the attorney-client privilege and Counsel's duties of confidentiality and loyalty, Counsel cannot disclose the specific circumstances prompting the instant Motion. However, multiple bases identified in Rule 1.16(b) of the Nevada Rules of Professional Conduct exist for Counsel's withdrawal. Generally, the relationship between Counsel and T1 Parties has broken down to the extent that Counsel can no longer effectively represent T1 Parties' interests. These issues would make Counsel's continued representation of them unreasonably difficult, financially burdensome and impractical. Counsel has made several attempts to resolve these issues, but attempts have been unsuccessful.

6. I have previously provided T1 Parties reasonable notice of the Firm's intention to withdraw, and have received no response.

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1 I declare under penalty of perjury that the foregoing is true and correct.  
2 Executed this 16th day of January, 2024, at Los Angeles, California.

3  
4 /s/ R.C. Harlan  
5 Richard C. Harlan  
6

7  
8 **IT IS SO ORDERED.**

9 DATED: 1/18/2024

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12 DANIEL J. ALBREGTS  
13 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of Larson LLP, and that on the 16th day of January, 2024, a true and correct copy of the foregoing document entitled **MOTION TO WITHDRAW AS COUNSEL *PRO HAC VICE*** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification. Notice was also provided to the following parties in the following manner:

Via USPS and FedEx

T1 Payments LLC  
10161 W. Park Run Drive, Suite 150  
Las Vegas, NV 89145

Via International Mail

T1 Payments Ltd.  
290 Moston Lane  
Manchester, England  
M40 9WB

/s/ R.C. Harlan

Richard C. Harlan

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
SOUTHERN DIVISION

T1 PAYMENTS, LLC, a Nevada limited  
liability company,

Plaintiff,

vs.

NEW U LIFE CORPORATION, a  
California corporation,

Defendant.

---

NEW U LIFE CORPORATION, a  
California corporation,

Counterclaimant,

vs.

T1 PAYMENTS LLC, a Nevada limited  
liability company, et al.,

Counterclaim-Defendants.

Case No. 2:19-cv-01816-ART-DJA

**(PROPOSED) ORDER GRANTING  
R.C. HARLAN'S MOTION TO  
WITHDRAW AS *PRO HAC VICE*  
COUNSEL FOR T1 PAYMENTS,  
LLC AND T1 PAYMENTS  
LIMITED**



**(PROPOSED) ORDER**

This matter having come before this Court pursuant to the motion to withdraw as *Pro Hac Vice* counsel for Plaintiff and Counterclaim-Defendant T1 Payments LLC and Counterclaim-Defendant T1 Payments Ltd. filed by R.C. Harlan.

GOOD CAUSE APPEARING THEREFOR:

**IT IS HEREBY ORDERED** that R.C. Harlan is hereby relieved as *Pro Hac Vice* attorney of record for Plaintiff and Counterclaim-Defendant T1 Payments LLC and Counterclaim-Defendant T1 Payments Ltd. in this action.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Larson LLP, and that on the 16th day of January, 2024, a true and correct copy of the foregoing document entitled **(PROPOSED) ORDER GRANTING R.C. HARLAN'S MOTION TO WITHDRAW AS *PRO HAC VICE* COUNSEL FOR T1 PAYMENTS, LLC AND T1 PAYMENTS LIMITED** was electronically filed with the Clerk of the Court by using CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification. Notice was also provided to the following parties in the following manner:

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10161 W. Park Run Drive, Suite 150  
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T1 Payments Ltd.  
290 Moston Lane  
Manchester, England  
M40 9WB

/s/ R.C. Harlan  
Richard C. Harlan